

UNCLASSIFIED / CLEARED FOR PUBLIC RELEASE

FILED WITH THE
COURT SECURITY OFFICER
CSO: [Signature]
DATE: 10/15/08

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DR. ALI AL-TIMIMI, PH.D

Defendant.

§
§
§
§
§
§
§
§
§
§

CR-04-385

UNDER SEAL

DEFENDANT DR. ALI AL-TIMIMI'S MOTION TO COMPEL DISCOVERY OF
EVIDENCE BEYOND THE NARROW SCOPE OF THE GOVERNMENT'S PRIOR
SEARCH OF NSA MATERIAL

Dr. Ali Al-Timimi, by counsel, respectfully moves for the government to be compelled to
(1) disclose any withheld evidence held by the government as a whole and without the prior
limitations on excluded dates; and (2) confirmation any undisclosed evidence involving the
material parties and communications detailed in both the earlier defense discovery request as
well as the attached memorandum of points and authorities.

Respectfully submitted,

Ali Al-Timimi, Ph.D

By Counsel

Jonathan Turley (*pro hac vice* lead counsel)
2000 H St., N.W.
Washington, D.C. 20052
(202) 994-7001 (phone)
(202) 994-9811 (facsimile)

Bryan Cave LLP
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005-3960
(202) 508-6000 (phone)
(202) 508-6200 (facsimile)

UNCLASSIFIED / CLEARED FOR PUBLIC RELEASE

269

UNCLASSIFIED / CLEARED FOR PUBLIC RELEASE

By: 

Jonathan Turley (cleared counsel)

Dated: October 10, 2008

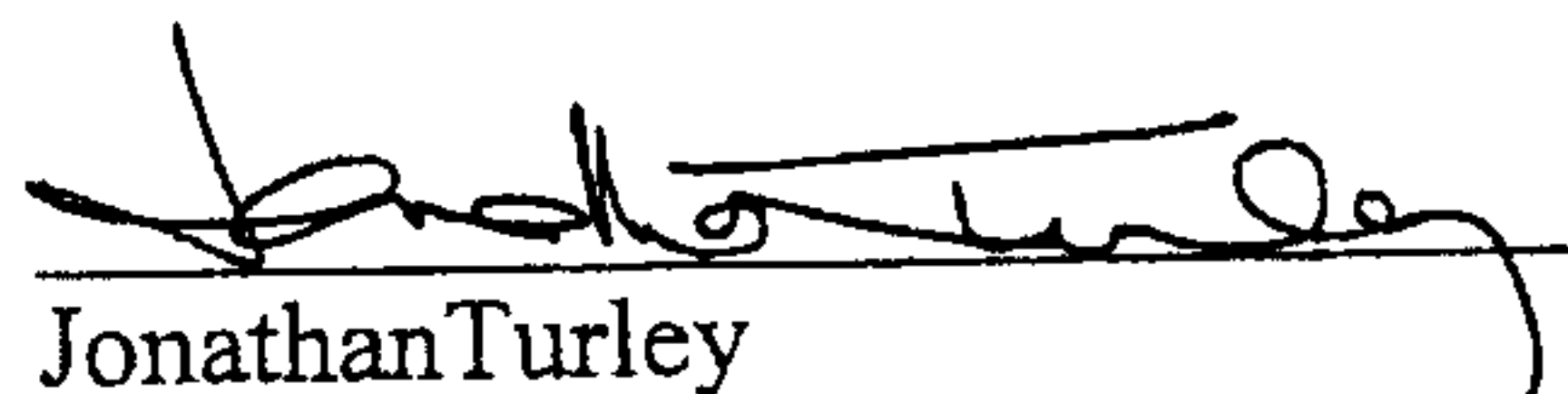
UNCLASSIFIED / CLEARED FOR PUBLIC RELEASE

UNCLASSIFIED / CLEARED FOR PUBLIC RELEASE

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2008, a true and correct copy of the foregoing was served by
court security staff upon:

Mr. Gordon Kromberg, Esq.
Assistant United States Attorney
2100 Jamieson Ave.
Alexandria, Virginia 22314-5794


Jonathan Turley

UNCLASSIFIED / CLEARED FOR PUBLIC RELEASE